



DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, WEST
NAVAL FACILITIES ENGINEERING COMMAND
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DALY CITY, CALIFORNIA 94014-1976

IN REPLY REFER TO

12 August 2003

From: Commanding Officer, Engineering Field Activity West, Naval Facilities
Engineering Command

To: Distribution

Subj: **DRAFT FINAL ANNUAL AMENDMENT TO THE SITE MANAGEMENT
PLAN (SMP) AND RESPONSES TO ENVIRONMENTAL PROTECTION
AGENCY COMMENTS ON THE DRAFT ANNUAL AMENDMENT TO
THE SMP, NAVAL WEAPONS STATION SEAL BEACH DETACHMENT
CONCORD, CALIFORNIA**

Encl: (1) Draft Final Annual Amendment to the Site Management Plan (SMP), Naval
Weapons Station Seal Beach Detachment Concord, Concord, California
(August 11, 2003)
(2) Responses to Environmental Protection Agency Comments on the Draft
Annual Amendment to the Site Management Plan, Naval Weapons Station Seal
Beach Detachment Concord, Concord, California (August 11, 2003)

1. In accordance with Section 12.4 of the Federal Facility Agreement (FFA), enclosure (1) is forwarded for your review and consideration for acceptance. Enclosure (1) is a primary document and in accordance with Section 12.4 (b) of the FFA, if this draft final Site Management Plan (SMP) is acceptable, finalization will take place in accordance with Subsections 12.4(e) and 12.5 of the FFA.
2. The discussions held between Mr. Phillip Ramsey of the US Environmental Protection Agency (EPA), Mr. Jim Pinasco of the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC), Mr. Laurent Meillier of the California Regional Water Quality Control Board (CRWQCB), San Francisco Bay Region; and the undersigned during the development of the enclosed SMP amendment were highly productive and appreciated. As required under Section 12.4 of the FFA, the following is a summary of proposed extensions or other Milestone changes that have been incorporated into the enclosed draft final SMP amendment. (Note: for convenience, the numbers in parentheses indicate the draft final SMP "ID" or line number for the document):
 - a. Submission of the Final Five-Year Periodic Review Assessment Report for the Litigation Area (2) is extended from 25 April 2003 (the date set in the Navy's extension request of 7 February 2003) to 30 June 2003. This extension was necessary to accommodate reviews of the final changes to ensure compliance with the agreed resolution of the Draft Final document that was in informal dispute. The final report was submitted per that schedule change.

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- b. Submission of the Draft Field Sampling Plan/Quality Assurance Project Plan (SAP/QAPP) for the Litigation Area Data Gaps Technical Evaluation (8) was extended from 14 February 2003 to 29 March 2003 per the Navy's extension request letter of 7 February 2003. Since 29 March was a Saturday, the draft SMP addendum (8) shows 31 March, the following Monday. In general, the enclosed draft final SMP addendum moves delivery dates to the following Monday whenever FFA review periods caused dates to fall on a weekend.
- c. The 45-day expedited review and responses to comments (RTC) times for the Litigation Area Draft Supplemental Feasibility Study (FS) report (30, 31) have been changed to the standard FFA review periods of 60 days. The prior delivery date for the FS of 27 November 2003 was extended to 19 January 2004 in the draft final SMP amendment.
- d. The submission date for the Revised Draft Final Record of Decision (ROD) for the Site 1 Tidal Area Landfill (48) is extended from 2 May 2003 (the date set in the Navy's extension request of 7 February 2003) to 27 June 2003. The additional time is requested to allow incorporation of relatively recent Navy guidance regarding Land Use Controls (LUCs), as well as completion of technical changes to respond to agencies comments. This document was submitted on 27 June.
- e. The submission date for the Draft Remedial Design for the Site 1 Tidal Area Landfill (54) is extended from 16 June 2003 (the date set in the Navy's extension request of 7 February 2003) to 15 December 2003 in order to incorporate design changes brought about by comments on the Revised Draft Final ROD. The draft SMP amendment (12 June 2003) incorrectly gave 26 August 2003 as the scheduled date because it inadvertently linked preparation of the draft design (53) to issuance of the revised draft final ROD (48) instead of the Final ROD (52).
- f. Change from draft SMP (12 June 2003): Line items 80 through 86 have been added for the first 5-Year Periodic Review of Site 1's remedy regarding source control (cap).
- g. The submission date for the Draft FSP/QAPP Groundwater Study for the Site 1 Tidal Area Landfill (88) is extended from 30 January 2003 to 29 December 2003.
- h. The submission date for the RTC on the Revised Draft Final Ecological Risk Assessment (ERA) for the Tidal Area Sites 2, 9, and 11 (140) is extended from 19 May 2003 (the date set in the Navy's extension request of 7 February 2003) to 27 June 2003. This extension was needed to allow Navy incorporation of feedback received from the agencies during meetings held 13 May and 3 June 2003 to discuss the Navy's proposed RTC. The RTC have been submitted.

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- i. The submission dates for the Tidal Area Sites Revised Draft Final RI Report (142) and Final Revised RI Report (143) are extended to accommodate the delayed completion of the RTC on the Revised Draft Final ERA that must precede these activities. The Navy had previously requested a 60-day extension for this Revised Draft Final RI Report in its 7 February 2003 letter. This extension for delivery of the Revised Draft Final by 8 August 2003 is in addition to that request. The document was submitted on 8 August.
- j. The submission date for the Revised Draft Final ROD Inland Area Site 17 (230) is extended from 29 January 2003 (the due date per US EPA's letter of 16 January 2003) to 25 November 2003 due to the need to collect additional groundwater samples for perchlorate analysis to resolve the informal dispute regarding Site 13. Activities associated with this sampling have been inserted into the draft SMP addendum (lines 182 to 193). Change from draft SMP (12 June 2003): Since issuance of the draft SMP amendment on 12 June 2003, the sampling at Site 13 has been completed and since the results indicate a low level presence (2 micrograms per liter and below) of perchlorate in Site 13 groundwater, Site 13 has been separated from the ROD. Instead, Site 13 will continue to be assessed and addressed as needed on a separate schedule. That schedule is reflected in line items 195 through 227.
- k. Change from draft SMP (12 June 2003): Line items 273 through 291 have been added to the schedule for Site 22's anticipated post-ROD activities.
- l. The submission date for the Draft Final FS Report and RTC for Inland Area Site 27 (297) is extended from 15 April 2003 (the date set in the Navy's extension request of 7 February 2003) to 5 September 2003.
- m. The submission date for the RTC on the Draft RI Report for SWMUs 2, 5, 7, and 18 (405) was established as 15 March 2003 per the Navy's extension request of 7 February 2003. Submission of the Draft Final RI Report (414) is extended from 15 August 2003 (the date set in the Navy's extension request of 7 February 2003) to 14 June 2004. The additional time is requested to allow completion of the soil gas survey to be conducted and incorporation of those results into the Draft Final RI report.
- n. Change from draft SMP (12 June 2003): The Agencies' review time for the Draft SAP Addendum for Soil Gas Investigation for the SWMUs (408) is extended by 7 days from 8 August to 15 August 2003. This extension was requested and granted to accommodate review of a key figure in that plan that was only recently provided to the agencies.

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- o. In the its extension request letter to EPA dated 20 December 2002, the Navy requested and was subsequently granted a 60-day extension for submission of the Site 31 (AOC-1) Draft Time Critical Removal Action (TCRA) Summary Report (470) that extended the delivery date from 9 January 2003 to 10 March 2003. The document was submitted on time. However, because supplemental groundwater and soil sampling results were not yet available, it was agreed that separate summary reports for each would be submitted. Therefore, the Supplemental Soil Sampling Summary Report (471) and Supplemental Groundwater Sampling Summary Report (474) were added to the SMP. While the Supplemental Soil Sampling Summary Report (471) was submitted by its 24 March 2003 deadline, the groundwater report (474) could not be due to delays in field sampling due to wet site conditions. The proposed schedule reflects a due date of 26 September 2003 that allows for the two rounds of groundwater samples to be collected.
 - p. Submission of the Draft Community Relations Plan (548) was extended, as agreed to with EPA, from 19 January 2003 to 17 April 2003. The plan was submitted 16 April 2003. The subsequent Draft Final CRP was submitted prior to the due date given in the draft SMP addendum; the enclosed reflects the actual delivery date of 6 August 2003.
 - q. In addition to the milestone changes given or proposed in a. through m. above, the draft final SMP addendum also contains changes to milestones for the documents or activities that are dependent on the above changes. For instance, an extension in time for preparing a FSP/QAPP would necessarily impact the fieldwork and resulting investigation report to which it is linked in the schedule. As the SMP has now been entered into project management software (MicroSoft Project Planner®), assessing the impacts of delays, or accelerations in the schedule become simple. This will facilitate SMP discussions and decision-making among the agencies and public.
4. If there are any questions or comments regarding the enclosures (1 and 2), please contact the undersigned at Telephone No. 650-746-7451.

Sincerely



STEPHEN F. TYAHLA, P.E., CHMM
By Direction

12 August 2003

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RESPONSES TO ENVIROMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT ANNUAL AMENDMENT TO THE SITE MANAGEMENT PLAN, NAVAL WEAPONS STATION SEAL BEACH DETACHMENT (NWS SBD) CONCORD, CONCORD, CALIFORNIA

This document presents the U.S. Department of the Navy's (Navy) responses to comments from the U.S. Environmental Protection Agency (EPA) on the Draft Annual Amendment to the Site Management Plan (Draft SMP Amendment) for NWS SBD Concord, Concord, California, dated June 12, 2003. The SMP Amendment is an attachment to the June 2001 Federal Facilities Agreement for NWS SBD Concord. The comments addressed below were received from EPA on July 14, 2003.

RESPONSES TO EPA COMMENTS

1. **Comment:** Cover Letter; Bullet "c"; Litigation Area Supplemental Feasibility Study deliverable date extension: In addition to documenting a change to the regulatory review period for the Supplemental Feasibility Study (FS), which U.S. EPA had informally requested, the Navy should document that the deliverable date has also been extended from November 27, 2003, until January 15, 2004. While U.S. EPA finds the extension acceptable, we do have concerns with the timing of field sampling efforts associated with the supplemental site investigation ("Data Gap Sampling") that may impact the draft FS deliverable date (see comment number 5 below).

Response: The Cover letter for the Draft Final Amendment to the SMP will be revised to indicate that the deliverable date for the Supplemental FS has been extended until January 19, 2004 in the Draft Final SMP.

The submittal date for the draft Supplemental Feasibility Study (FS) is not dependent on the completion of the Data Gaps Technical Memorandum; any delays in completion of the Data Gaps Technical Memorandum should not affect the submittal date for the Supplemental FS. The Data Gaps Technical Memorandum is primarily intended to address specific data gaps identified in the 5-year periodic review assessment report related to ongoing contaminant sources from neighboring properties. The remedial alternatives proposed for evaluation in the Supplemental FS are not expected to be affected by the results of the Data Gaps Technical Memorandum. Information generated by the Data Gaps Investigation will be incorporated into the Draft or Draft Final FS when available.

2. **Comment:** Cover Letter; Bullet "h" ; Deliverable due dates for Tidal Area Sites 2,9, and 11 Draft Final Remedial Investigation (RI) and Final RI: Pursuant to the Navy's February 7, 2003 SMP extension Request, the Navy has already requested a 60-day extension for submitting the draft final RI following transmittal of Navy Response to Regulatory

Comments on a revised draft final Ecological Risk Assessment. The statement should be revised to reflect this.

Response: The Cover letter for the Draft Final Amendment to the SMP will be revised to indicate that a 60-day extension on the submittal of the Draft Final RI and Final RI for Tidal Area Sites 2, 9, and 11 was previously requested through the Navy's February 7, 2003 SMP Extension Request.

3. **Comment:** **Cover Letter; Bullet "i"; Sites 13/17 Revised Draft Final Record of Decision (ROD) extension: The Navy requests an extension in deliverable due date for a Revised Draft Final ROD. Based upon preliminary groundwater sampling results and the confirmed detection of perchlorate at Site 13 and as informally discussed with the Navy, a "No-Action" ROD is no longer possible for Site 13. As a result, the Navy should assess the need for any additional site characterization activities versus preparation of a Draft Feasibility Study to evaluate groundwater remedial action alternatives, discuss the Navy's recommended strategy with the regulators, and modify the draft final SMP accordingly based upon discussions.**

Response: As discussed during the July 22, 2003 Remedial Project Managers (RPM) meeting, the Navy is currently developing a strategy on how to proceed with the closure of Site 13, given the recent low level detections of perchlorate at that site. The Navy will revise the Draft Final SMP schedule to remove all references to Site 13 in the Revised Draft Final Record of Decision for Sites 13 and 17 (lines 189 through 194 of the Draft SMP Amendment), and will proceed with preparation of a Revised Draft Final Record of Decision for Site 17 only.

For Site 13, the Navy proposes to further assess groundwater at the site with respect to the detected perchlorate through review of existing data, preparation of an appropriate sampling and analysis plan (SAP) (or addendum of an existing SAP), and execution of that SAP. The Navy proposes to document such additional data in an Addendum report to the existing RI. Further, as warranted, a follow-on FS would be performed and an appropriate remedial action proposed and then selected via the normal CERCLA process. The Draft Final SMP has been modified to reflect this suggested strategy.

4. **Comment:** **Litigation Area Long-Term Monitoring Plan: The Navy needs to include with the Litigation Area schedule tasks associated with the development of a Litigation Area Long-Term Monitoring Plan. The need for long-term monitoring of the Litigation Area was the primary basis of a U.S. EPA' raised informal dispute on an October 2002, Litigation Area Draft Final Five-Year Assessment Report, and the Navy's agreement to include the development of a Long-term Monitoring Plan in 2004 that would be reflected in the subject SMP Amendment, was the basis for resolving the informal dispute. As correctly stated in the June 2003, Litigation Area Final Five - Year**

Assessment Report, Section 10.1, Recommendations for Future Monitoring on page 10-3, "[i]n developing the monitoring plan using the [Data Quality Objective] process, the Navy will meet with the regulatory agencies this year to determine monitoring requirements and will include the monitoring plan in the next annual amendment to the site management plan (emphasis added)."

Response: A draft and final "Post-remedial Action Monitoring Plan" is included in the June 12, 2003 version of the SMP as lines 3 through 7. The draft plan is currently scheduled for submittal on March 26, 2004 and the final plan is scheduled for submittal on July 26, 2004. Meetings with the regulatory agencies to discuss the scope of the draft plan will be anticipated in the fall/winter 2003, in accordance with the recommendations in the 5-Year Periodic Review Assessment Report.

- 5. Comment:** **Litigation Area Data Gaps Technical Evaluation (supplemental site investigations); line 14, Field Work: U.S. EPA is still unclear on how the supplemental site investigation will be conducted during September 11 through October 22, 2003, as a component of the investigation will be an evaluation of groundwater - surface water interactions at Nichols Creek. As informally discussed with the Navy during development of the Draft SMP Amendment, it is U.S. EPA's belief that this component of the investigation needs to occur during winter months, following significant precipitation and with actual surface water flows in Nichols Creek. Based upon our previous discussion, the Navy was going to re-evaluate the Data Gaps schedule and consider modifications to accommodate seasonal hydrological and hydrogeological conditions. Please explain how the Navy will accomplish tasks associated with the groundwater-surface water evaluation given the proposed schedule or re-consider modifications to the supplemental site investigation schedule.**

Response: The fieldwork schedule for the Litigation Area Data Gaps Technical Evaluation, line 14 of the Draft Final Amendment of the SMP, will be revised to indicate that the field work will be conducted during September, 2003 to February, 2004. This extended sampling period is to accommodate water level elevation measurements in both wet and dry seasons, as indicated in the final Sampling and Analysis Plan for the Data Gaps Technical Evaluation, submitted on July 29, 2003. It is not anticipated that the fieldwork schedule will impact the submittal date of the draft supplemental FS report; in fact, in the SMP schedule, there is no link between the two events.

- 6. Comment:** **Tidal Area Landfill; Five-Year Assessment Report: The Navy needs to include an estimated schedule for producing Five-Year Assessment Report(s) for the Tidal Area Landfill.**

Response: The Navy will revise the Draft Final Amendment to the Site Management Plan to include a Five-Year Periodic Review Assessment report for the Site 1 Landfill.

7. **Comment:** Site 22; post ROD deliverables (Line 232): The Navy indicates post-ROD deliverables may be required and will be added to the SMP in the future as warranted. However, based upon of the February 2003 Draft Supplemental RI Report, U.S. EPA believes that at a minimum the following post-ROD deliverables are required for Site 22; Land Use Control Implementation Plan, Long-Term Monitoring Plan, and Five-Year Assessment Reports. Therefore, please update the SMP Amendment to include estimated deliverable dates for these documents. The note on line 232 should also be revised to indicate that remedial design and remedial action may be necessary; these items will be added to the SMP in the future, as warranted.

Response: The post-ROD deliverables will be added as suggested. The note on line 232 will be revised as suggested.

8. **Comment:** Footnotes: In order to more precisely describe an ongoing disagreement between the Navy and U.S. EPA on post-ROD deliverables being primary or secondary documents, please change footnote 1 to read, "The Navy and U.S. EPA do not agree on whether *certain* Post ROD documents should be considered primary or secondary documents (FFA 10.3(d))."

Response: The footnotes will be revised as suggested.

9. **Comment:** Footnotes; The following footnote changes need to be made for the specific site schedules:
- a. **Litigation Area:** Schedules end with ROD; however, no post-ROD deliverables are projected. At a minimum and as agreed to by the Navy and U.S. EPA in past discussions on the Concord SMP, the Navy could include a footnote indicating, "remedial design, remedial action, and land use controls, may be necessary and these will be added to the site management plan in the future, as required."
 - b. **Sites 13/17:** The note on line 194 should be revised to indicate that remedial design and remedial action may be necessary; these items will be added to the SMP in the future, as warranted.
 - c. **Site 22:** The note on line 232 should be revised to indicate that remedial design and remedial action may be necessary; these items will be added to the SMP in the future, as warranted.
 - d. **Site 29:** A note on line 290 should indicate that a Land Use Control Implementation Plan, Long-Term Monitoring Plan, and Five-Year

Assessment Reports may be necessary; these items will be added to the SMP in the future, as warranted.

- e. Site 30: A note on line 338 should indicate that a Land Use Control Implementation Plan, Long-Term Monitoring Plan, and Five-Year Assessment Reports may be necessary; these items will be added to the SMP in the future, as warranted.**
- f. SWMUs 2, 5, 7, and 18: A note on line 407 should indicate that a Five-Year Assessment Report may be necessary; this will be added to the SMP in the future, as warranted.**
- g. Site 31 (AOC-1): A note on line 468 should indicate that a Land Use Control Implementation Plan, Long-Term Monitoring Plan, and Five-Year Assessment Reports may be necessary; these items will be added to the SMP in the future, as warranted.**

Response: The Navy will address comment 9 as follows:

- a. A footnote to the Litigation Area schedule will be added to the Draft Final Amendment to the SMP, as suggested.
- b. See response to Comment #3. The Navy will revise the schedule for Sites 13 and 17 to de-link the two sites. As such, the suggested footnote will not be added to the Site 17 schedule, as this site is recommended for no further action; and further assessment and action at Site 13 is proposed for deferral to the Navy's Munitions Response Program (MRP).
- c. A footnote to the Site 22 schedule will be added to the Draft Final Amendment to the SMP, as suggested.
- d. A footnote to the Site 29 schedule will be added to the Draft Final Amendment to the SMP, as suggested.
- e. A footnote to the Site 30 schedule will be added to the Draft Final Amendment to the SMP, as suggested.
- f. A footnote to the SWMU Sites 2, 5, 7, and 18 schedule will be added to the Draft Final Amendment to the SMP, as suggested.
- g. A footnote to the SWMU Sites 2, 5, 7, and 18 schedule will be added to the Draft Final Amendment to the SMP, as suggested.

Notes: Page 1 File name: Draft Final Annual Addendum NWS Concord SMP- 11 Aug 2003

1 The Navy and EPA do not agree on whether certain Post-ROD documents should be considered primary or secondary documents (FFA 10.3(d)).

Notes: Page 2 File name: Draft Final Annual Addendum NWS Concord SMP- 11 Aug 2003

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DRAFT FINAL		NWS Seal Beach Detachment Concord Draft Final Annual Amendment Site Management Plan (SMP) Schedule					11 August 2003	
ID	Task Name	Calendar Days	Start	Finish	Predecessors	Action Party	Primary or Secondary (1)	
76	Draft LUC RD	0 edays	Tue 7/27/04	Tue 7/27/04	75	Navy	Secondary	
77	Agency Comments on Draft LUC RD	62 edays	Tue 7/27/04	Mon 9/27/04	76	Agencies	Secondary	
78	Prepare Final LUC RD and RTC on Draft	91 edays	Mon 9/27/04	Mon 12/27/04	77	Navy	Secondary	
79	Final LUC RD and RTC on Draft	0 edays	Mon 12/27/04	Mon 12/27/04	78	Navy	Secondary	
80	Prepare 5-Year Periodic Review Assessment #1	181 edays	Tue 10/3/06	Mon 4/2/07	67	Navy	Secondary	
81	Draft 5-Year Periodic Review Assessment #1	0 edays	Mon 4/2/07	Mon 4/2/07	80	Navy	Secondary	
82	Agency Comments Draft 5-Year Periodic Review Assessment #1	60 edays	Mon 4/2/07	Fri 6/1/07	81	Agencies	Secondary	
83	Prepare RTC Draft 5-Year Periodic Review Assessment #1	31 edays	Fri 6/1/07	Mon 7/2/07	82	Navy	Secondary	
84	RTC Draft 5-Year Periodic Review Assessment #1	0 edays	Mon 7/2/07	Mon 7/2/07	83	Navy	Secondary	
85	Prepare Final 5-Year Periodic Review Assessment #1	30 edays	Mon 7/2/07	Wed 8/1/07	84	Navy	Secondary	
86	Final 5-Year Periodic Review Assessment #1	0 edays	Wed 8/1/07	Wed 8/1/07	85	Navy	Secondary	
87	Prepare Draft FSP/QAPP Groundwater (GW) Study	60 edays	Thu 10/30/03	Mon 12/29/03		Navy	Primary	
88	Draft FSP/QAPP GW Study	0 edays	Mon 12/29/03	Mon 12/29/03	87	Navy	Primary	
89	Agency Comments - Draft FSP/QAPP GW Study	60 edays	Mon 12/29/03	Fri 2/27/04	88	Agencies	Primary	
90	Prepare Draft Final FSP/QAPP and RTC GW Study	60 edays	Fri 2/27/04	Tue 4/27/04	89	Navy	Primary	
91	Draft Final FSP/QAPP and RTC GW Study	0 edays	Tue 4/27/04	Tue 4/27/04	90	Navy	Primary	
92	Final FSP/QAPP GW Study	0 edays	Thu 5/27/04	Thu 5/27/04	91FS+30 edays	Navy	Primary	
93	Implement GW Sampling (NOTE: Estimated duration- Actual duration to be determined based on scope of Final FSP/QAPP. Change to duration would affect subsequent tasks.)	60 edays	Thu 5/27/04	Mon 7/26/04	92	Navy	Primary	
94	Prepare Draft GW Study Report	122 edays	Mon 7/26/04	Thu 11/25/04	93	Navy	Primary	
95	Draft GW Study Report	0 edays	Thu 11/25/04	Thu 11/25/04	94	Navy	Primary	
96	Agency Comments on Draft GW Study Report	60 edays	Thu 11/25/04	Mon 1/24/05	95	Agencies	Primary	
97	Prepare Draft Final GW Study Report and RTC	60 edays	Mon 1/24/05	Fri 3/25/05	96	Navy	Primary	
98	Draft Final GW Study Report and RTC	0 edays	Fri 3/25/05	Fri 3/25/05	97	Navy	Primary	
99	Final GW Study Report	0 edays	Mon 4/25/05	Mon 4/25/05	98FS+31 edays	Navy	Primary	
100	Prepare Draft Feasibility Study for GW	60 edays	Mon 4/25/05	Fri 6/24/05	99	Navy	Primary	
101	Draft Feasibility Study for GW	0 edays	Fri 6/24/05	Fri 6/24/05	100	Navy	Primary	
102	Agency Comments on Draft FS for GW	60 edays	Fri 6/24/05	Tue 8/23/05	101	Agencies	Primary	
103	Prepare Draft Final Feasibility Study for GW and RTC	62 edays	Tue 8/23/05	Mon 10/24/05	102	Navy	Primary	
104	Draft Final Feasibility Study of GW and RTC	0 edays	Mon 10/24/05	Mon 10/24/05	103	Navy	Primary	
105	Final Feasibility Study for GW	0 edays	Wed 11/23/05	Wed 11/23/05	104FS+30 edays	Navy	Primary	
106	Prepare Draft Proposed Plan GW	61 edays	Wed 11/23/05	Mon 1/23/06	105	Navy	Primary	
107	Draft Proposed Plan GW	0 edays	Mon 1/23/06	Mon 1/23/06	106	Navy	Primary	
108	Agency Comments on Draft Proposed Plan GW	60 edays	Mon 1/23/06	Fri 3/24/06	107	Agencies	Primary	
109	Prepare RTC and Draft Final Proposed Plan GW	60 edays	Fri 3/24/06	Tue 5/23/06	108	Navy	Primary	
110	Draft Final Proposed Plan and RTC GW	0 edays	Tue 5/23/06	Tue 5/23/06	109	Navy	Primary	
111	Final Proposed Plan for Public Review GW	0 edays	Thu 6/22/06	Thu 6/22/06	110FS+30 edays	Navy	Primary	
112	Proposed Plan Public Comment Period- GW	32 edays	Thu 6/22/06	Mon 7/24/06	111	Navy	Primary	
113	Prepare Draft Record of Decision (ROD) GW	30 edays	Mon 7/24/06	Wed 8/23/06	112	Navy	Primary	
114	Draft ROD GW	0 edays	Wed 8/23/06	Wed 8/23/06	113	Navy	Primary	
115	Agency Comments on Draft ROD GW	61 edays	Wed 8/23/06	Mon 10/23/06	114	Agencies	Primary	
116	RTC and Draft Final ROD GW	60 edays	Mon 10/23/06	Fri 12/22/06	115	Navy	Primary	

Notes:

1 The Navy and EPA do not agree on whether certain Post-ROD documents should be considered primary or secondary documents (FFA 10.3(d)).

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DRAFT FINAL		NWS Seal Beach Detachment Concord Draft Final Annual Amendment Site Management Plan (SMP) Schedule				11 August 2003	
ID	Task Name	Calendar Days	Start	Finish	Predecessors	Action Party	Primary or Secondary (1)
422	Final FS	0 edays	Wed 5/25/05	Wed 5/25/05	421FS+30 edays	Navy	Primary
423	Prepare Draft Proposed Plan	120 edays	Wed 5/25/05	Thu 9/22/05	422	Navy	Primary
424	Draft Proposed Plan	0 edays	Thu 9/22/05	Thu 9/22/05	423	Navy	Primary
425	Agency Comments on Draft Proposed Plan	60 edays	Thu 9/22/05	Mon 11/21/05	424	Agencies	Primary
426	Prepare RTC and Draft Final Proposed Plan	60 edays	Mon 11/21/05	Fri 1/20/06	425	Navy	Primary
427	Draft Final Proposed Plan and RTC	0 edays	Fri 1/20/06	Fri 1/20/06	426	Navy	Primary
428	Final Proposed Plan	0 edays	Mon 2/20/06	Mon 2/20/06	427FS+31 edays	Navy	Primary
429	Proposed Plan Public Comment Period	30 edays	Mon 2/27/06	Wed 3/29/06	428FS+7 edays	Navy	Primary
430	Prepare Draft ROD	30 edays	Wed 3/29/06	Fri 4/28/06	429	Navy	Primary
431	Draft ROD	0 edays	Fri 4/28/06	Fri 4/28/06	430	Navy	Primary
432	Agency Comments Draft ROD	60 edays	Fri 4/28/06	Tue 6/27/06	431	Agencies	Primary
433	Prepare RTC and Draft Final ROD	62 edays	Tue 6/27/06	Mon 8/28/06	432	Navy	Primary
434	Draft Final ROD and RTC	0 edays	Mon 8/28/06	Mon 8/28/06	433	Navy	Primary
435	Final ROD	0 edays	Wed 9/27/06	Wed 9/27/06	434FS+30 edays	Navy	Primary
436	ROD Signatures	0 edays	Wed 10/18/06	Wed 10/18/06	435FS+21 edays	Both	Primary
437	Prepare Draft Remedial Design (RD)	30 edays	Wed 10/18/06	Fri 11/17/06	436	Navy	Primary
438	Draft RD	0 edays	Fri 11/17/06	Fri 11/17/06	437	Navy	Primary
439	Agency Comments Draft RD	60 edays	Fri 11/17/06	Tue 1/16/07	438	Agencies	Primary
440	Prepare RTC and Pre-Final RD	62 edays	Tue 1/16/07	Mon 3/19/07	439	Navy	Primary
441	Pre-Final RD and RTC	0 edays	Mon 3/19/07	Mon 3/19/07	440	Navy	Primary
442	Agency Comments on Pre-Final RD	45 edays	Mon 3/19/07	Thu 5/3/07	441	Agencies	Primary
443	Prepare Final RD	46 edays	Thu 5/3/07	Mon 6/18/07	442	Navy	Primary
444	Final RD	0 edays	Mon 7/2/07	Mon 7/2/07	443FS+14 edays	Navy	Primary
445	Commence Remedial Action (RA)	0 edays	Fri 8/31/07	Fri 8/31/07	444FS+60 edays	Navy	Secondary
446	Perform RA	262 edays	Fri 8/31/07	Mon 5/19/08	445	Navy	Secondary
447	Complete RA	0 edays	Mon 5/19/08	Mon 5/19/08	446	Navy	Secondary
448	Prepare Draft O&M Plan	102 edays	Fri 8/31/07	Tue 12/11/07	445	Navy	Secondary
449	Draft O&M Plan	0 edays	Tue 12/11/07	Tue 12/11/07	448	Navy	Secondary
450	Agency Comments- Draft O&M Plan	62 edays	Tue 12/11/07	Mon 2/11/08	449	Agencies	Secondary
451	Prepare RTC and Draft Final O&M Plan	60 edays	Mon 2/11/08	Fri 4/11/08	450	Navy	Secondary
452	Draft Final O&M Plan and RTC	0 edays	Fri 4/11/08	Fri 4/11/08	451	Navy	Secondary
453	Final O&M Plan	0 edays	Mon 5/12/08	Mon 5/12/08	452FS+31 edays	Navy	Secondary
454	Implement O&M	0 edays	Wed 6/11/08	Wed 6/11/08	453FS+30 edays	Navy	Primary
455	Prepare Draft Land Use Control Remedial Design (LUC RD)	62 edays	Tue 12/11/07	Mon 2/11/08	449	Navy	Secondary
456	Draft LUC RD	0 edays	Mon 2/11/08	Mon 2/11/08	455	Navy	Secondary
457	Agency Comments on Draft LUC RD	60 edays	Mon 2/11/08	Fri 4/11/08	456	Agencies	Secondary
458	Prepare Final LUC RD and RTC on Draft	60 edays	Fri 4/11/08	Tue 6/10/08	457	Navy	Secondary
459	Final LUC RD and RTC on Draft	0 edays	Tue 6/10/08	Tue 6/10/08	458	Navy	Secondary
460	Prepare Draft Long-term Monitoring (LTM) Plan	60 edays	Mon 2/11/08	Fri 4/11/08	450	Navy	Secondary
461	Draft LTM Plan	0 edays	Fri 4/11/08	Fri 4/11/08	460	Navy	Secondary
462	Agency Comments on Draft LTM Plan	60 edays	Fri 4/11/08	Tue 6/10/08	461	Agencies	Secondary
463	Prepare RTC and Draft Final LTM Plan	62 edays	Tue 6/10/08	Mon 8/11/08	462	Navy	Secondary
464	Draft Final LTM Plan and RTC	0 edays	Mon 8/11/08	Mon 8/11/08	463	Navy	Secondary

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DRAFT FINAL		NWS Seal Beach Detachment Concord Draft Final Annual Amendment Site Management Plan (SMP) Schedule					11 August 2003	
ID	Task Name	Calendar Days	Start	Finish	Predecessors	Action Party	Primary or Secondary (1)	
465	Final LTM Plan	0 edays	Wed 9/10/08	Wed 9/10/08	464FS+30 edays	Navy	Secondary	
466	Implement LTM Plan (Note- 5-Year reviews may be necessary. These will be added to the SMP in the future, as warranted.)	0 edays	Mon 11/10/08	Mon 11/10/08	465FS+61 edays	Navy	Secondary	
467								
468	Site 31 (AOC-1)	1916 days	Tue 12/10/02	Mon 4/12/10				
469	Complete Time Critical Removal Action (TCRA)	0 edays	Tue 12/10/02	Tue 12/10/02		Navy	Secondary	
470	Draft TCRA Summary Report	0 edays	Mon 3/10/03	Mon 3/10/03		Navy	Secondary	
471	Supplemental Soil Sampling Summary Report	0 edays	Mon 3/24/03	Mon 3/24/03		Navy	Secondary	
472	Agency Comments on Draft TCRA Summary Report	60 edays	Mon 3/24/03	Fri 5/23/03	471	Agencies	Secondary	
473	Prepare Supplemental Ground-water Sampling Summary Report	200 edays	Mon 3/10/03	Fri 9/26/03	470	Navy	Secondary	
474	Supplemental Ground-water Sampling Summary Report	0 edays	Fri 9/26/03	Fri 9/26/03	473	Navy	Secondary	
475	Prepare RTC and Final TCRA Summary Report	60 edays	Fri 5/23/03	Tue 7/22/03	472	Navy	Secondary	
476	Final TCRA Summary Report and RTC	0 edays	Tue 7/22/03	Tue 7/22/03	475	Navy	Secondary	
477	Prepare Draft RI Work Plan (SAP)	120 edays	Mon 12/15/03	Tue 4/13/04		Navy	Primary	
478	Draft RI Work Plan (SAP)	0 edays	Tue 4/13/04	Tue 4/13/04	477	Navy	Primary	
479	Agency Comments on Draft RI Work Plan (SAP)	62 edays	Tue 4/13/04	Mon 6/14/04	478	Agencies	Primary	
480	Prepare RTC and Draft Final RI Work Plan (SAP)	60 edays	Mon 6/14/04	Fri 8/13/04	479	Navy	Primary	
481	Draft Final RI Work Plan (SAP) and RTC	0 edays	Fri 8/13/04	Fri 8/13/04	480	Navy	Primary	
482	Agency Review of Draft Final Work Plan (SAP)	31 edays	Fri 8/13/04	Mon 9/13/04	481	Agencies	Primary	
483	Prepare Final RI Work Plan (SAP)	30 edays	Mon 9/13/04	Wed 10/13/04	482	Navy	Primary	
484	Final RI Work Plan (SAP)	0 edays	Wed 10/13/04	Wed 10/13/04	483	Navy	Primary	
485	Implement RI Work Plan	0 edays	Mon 12/13/04	Mon 12/13/04	484FS+61 edays	Navy	Primary	
486	Perform RI Field Work & Prepare Draft RI Report	120 edays	Mon 12/13/04	Tue 4/12/05	485	Navy	Primary	
487	Draft RI Report	0 edays	Tue 4/12/05	Tue 4/12/05	486	Navy	Primary	
488	Agency Comments on Draft RI Report	62 edays	Tue 4/12/05	Mon 6/13/05	487	Agencies	Primary	
489	Prepare RTC and Draft Final RI Report	60 edays	Mon 6/13/05	Fri 8/12/05	488	Navy	Primary	
490	Draft Final RI Report and RTC	0 edays	Fri 8/12/05	Fri 8/12/05	489	Navy	Primary	
491	Final RI Report	0 edays	Tue 9/13/05	Tue 9/13/05	490FS+32 edays	Navy	Primary	
492	Prepare Draft FS Report	120 edays	Tue 9/13/05	Wed 1/11/06	491	Navy	Primary	
493	Draft FS Report	0 edays	Wed 1/11/06	Wed 1/11/06	492	Navy	Primary	
494	Agency Comments on Draft FS Report	61 edays	Wed 1/11/06	Mon 3/13/06	493	Agencies	Primary	
495	Prepare RTC and Draft Final FS Report	60 edays	Mon 3/13/06	Fri 5/12/06	494	Navy	Primary	
496	Draft Final FS Report	0 edays	Fri 5/12/06	Fri 5/12/06	495	Navy	Primary	
497	Final FS Report	0 edays	Tue 6/13/06	Tue 6/13/06	496FS+32 edays	Navy	Primary	
498	Prepare Draft Proposed Plan	90 edays	Tue 6/13/06	Mon 9/11/06	497	Navy	Primary	
499	Draft Proposed Plan	0 edays	Mon 9/11/06	Mon 9/11/06	498	Navy	Primary	
500	Agency Comments on Draft Proposed Plan	60 edays	Mon 9/11/06	Fri 11/10/06	499	Agencies	Primary	
501	Prepare RTC and Draft Final Proposed Plan	60 edays	Fri 11/10/06	Tue 1/9/07	500	Navy	Primary	
502	Draft Final Proposed Plan and RTC	0 edays	Tue 1/9/07	Tue 1/9/07	501	Navy	Primary	
503	Final Proposed Plan	0 edays	Fri 2/9/07	Fri 2/9/07	502FS+31 edays	Navy	Primary	
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ID	Task Name	Calendar Days	Start	Finish	Predecessors	Action Party	Primary or Secondary (1)
545	Draft Final SMP Amendment	0 edays	Fri 8/12/05	Fri 8/12/05	544	Navy	Primary
546							
547	COMMUNITY RELATIONS PLAN	102 days	Thu 4/17/03	Fri 9/5/03			
548	Draft Community Relations Plan (CRP)	0 edays	Thu 4/17/03	Thu 4/17/03		Navy	Primary
549	Agency Comments on Draft CRP	60 edays	Thu 4/17/03	Mon 6/16/03	548	Agencies	Primary
550	Prepare RTC and Draft Final CRP	60 edays	Mon 6/16/03	Fri 8/15/03	549	Navy	Primary
551	Draft Final CRP and RTC	0 edays	Wed 8/6/03	Wed 8/6/03		Navy	Primary
552	Final CRP	0 edays	Fri 9/5/03	Fri 9/5/03	551FS+30 edays	Navy	Primary

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